

Sage Legal LLC

18211 Jamaica Avenue • Jamaica, NY 11423-2327 • (718) 412-2421 • emanuel@sagelegal.nyc

March 20, 2024

VIA ECF

United States District Court
Southern District of New York
Attn: Hon. Kenneth M. Karas, U.S.D.J.
300 Quarropas Street, Courtroom 521
White Plains, NY 10601-4150

Re: Huerta, et al. v. J.D. Workforce, Inc., et al.
Case No.: 7:23-cv-5382 (KMK) (AEK)

Dear Judge Karas:

This firm represents Defendants J.D. Workforce, Inc., Hamwattie Bissoon, and Steven Deane (collectively hereinafter the “Defendants”), and respectfully writes to follow up on its previously filed letter motion for an extension of time to submit their motion to dismiss. Pursuant to ¶ 1(C) of this Court’s Individual Rules of Practice (the “Individual Rules”), Defendants respectfully seek an extension of time until Friday, April 5, 2024 and submit that:

(i) the original briefing schedule for Defendants’ motion to dismiss was February 23, 2024 for moving papers, March 29, 2024 for Plaintiffs’ opposition papers, and April 12, 2024 for Defendants’ reply papers;

(ii-iii) there has been one (1) previous request for an extension of this briefing schedule, which Plaintiffs consented to, but which this Court did not rule on;¹ and

(iv) Plaintiffs do not consent to the instant requested extension and have proposed the following briefing schedule; Defendants propose deadlines of May 13, 2024 for Plaintiffs’ opposition papers, and May 24, 2024 for Defendants’ reply papers.

The reason for the request is due to your undersigned’s oversight in not calendaring the deadline to submit the instant motion as Defendants awaited an Order on their prior letter motion for an extension of time. Based on the foregoing, Defendants respectfully submit that there exists sufficient good cause and excusable neglect for this Court to exercise its discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(B).

Defendants thank this Court for its time and attention to this case.

¹ The letter motion for an extension of time was submitted in tandem with your undersigned’s letter motion to substitute in as counsel. This Court granted the motion to substitute, but did not address Defendants’ letter motion for an extension, leading to an oversight on your undersigned’s part.

Dated: Lake Success, New York
March 20, 2024

Respectfully submitted,

SAGE LEGAL LLC

/s/ Emanuel Kataev, Esq.

Emanuel Kataev, Esq.
18211 Jamaica Avenue
Jamaica, NY 11423-2327
(718) 412-2421 (office)
(917) 807-7819 (cellular)
(718) 489-4155 (facsimile)
emanuel@sagelegal.nyc

*Attorneys for Defendants
J.D. Workforce, Inc.,
Hamwattie Bissoon,
and Steven Deane*

VIA ECF

Katz Melinger PLLC
Attn: Katherine Morales & Nicole D. Grunfeld, Esqs.
370 Lexington Avenue Suite 1512
New York, NY 10017-0045
ndgrunfeld@katzmelinger.com
kymorales@katzmelinger.com

*Attorneys for Plaintiffs
Jose Huerta,
Vinicio Mera,
Jose Florez, and
Elvia Borja*

VIA ECF

Allyn & Fortuna LLP
Attn: Nicholas Fortuna, Esq.
1010 Avenue of the Americas
Suite 302
New York, NY 10018-0023
nfortuna@allynfortuna.com

*Attorneys for Defendants
Marav USA LLC d/b/a Bingo Wholesale
and David Weiss*